

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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RUQAYYAH SHABAZZ,

Plaintiff,

-against-

CITY OF NEW YORK, et al.,

Defendants.

**DECLARATION OF
GABRIEL P. HARVIS
IN SUPPORT OF
MOTION FOR
ATTORNEYS' FEES
AND COSTS**

14 CV 6417 (GHW)

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PLEASE TAKE NOTICE that, upon the accompanying Declarations of Gabriel P. Harvis and Baree N. Fett, the exhibits annexed thereto, and the accompanying Memorandum of Law, and upon all the prior pleadings and proceedings herein, plaintiff moves this Court, at the Courthouse located at 500 Pearl Street, New York, New York, at a date and time to be selected by the Court, for an order awarding attorneys' fees and other discretionary costs to plaintiff in the total amount of \$38,207.71 pursuant to Rule 54(d) of the Federal Rules of Civil Procedure and 42 U.S.C. § 1988, as follows:

- a. Attorney's fee for Gabriel P. Harvis in the amount of \$34,387.50;
- b. Attorney's fee for Baree N. Fett in the amount of \$2,730.00;
- c. Paralegal costs in the amount of \$135.00;
- d. Reasonable costs and expenses in the amount of \$955.21; and
- e. Such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposition papers are to be served within ten business days after service of these motion papers.

Dated: New York, New York
July 30, 2015

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By: 
Gabriel P. Harvis

Attorneys for plaintiff Ruqayyah Shabazz

To: David Cooper, Esq. (by ECF)
Attorney for defendants